## HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

Advising:

US Dept of Energy **US** Environmental Protection Agency Washington State Dept of Ecology

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Liaison Representatives Washington State Department of Health February 4, 2016

The Honorable Monica Regalbuto Assistant Secretary for Environmental Management U.S. Department of Energy 1000 Independence Avenue SW

Washington D.C. 20585

Re: Discontinue funding for CRESP studies from Hanford cleanup dollars

Dear Assistant Secretary Regalbuto,

The Hanford Advisory Board (Board) is writing with respect to the draft Hanford Site-Wide Risk Review Project's Interim Progress Report (August 31, 2015), prepared by the Consortium for Risk Evaluation with Stakeholder Participation (CRESP). The Board concurs with the States of Washington and Oregon who have expressed the opinion that no substantive justification is provided in the report to deviate from the cleanup path at Hanford that has been pursued for more than 25 years and is spelled out in the Tri-Party Agreement.

Provisions of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Consent Decree, and Records of Decision provide the blueprint for how cleanup shall proceed. These provisions are based on extensive scientific analysis including risk analysis and significant public review and input. Because of the involvement from the States of Washington and Oregon, Tribal nations, the Board, and other stakeholders, we believe the risks related to Hanford cleanup processes are being properly considered in current policies and procedures.

Regardless of why the CRESP report was commissioned, we are concerned that its findings may be used to help justify doing less cleanup at Hanford. We have seen numerous attempts through the years to do just that – all based on the premise that it is too expensive to do the cleanup that DOE has committed to complete. We believe that the waste generated by the federal government should be cleaned up by the federal government.

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While the information in the CRESP study is interesting, it is also true that this study was compiled at significant cost and that funding was diverted from Hanford cleanup funds. We believe that significant cleanup progress could have been made this year with those funds.

Based on what we see in the draft report, and given the fact that this report already covers the most significant and challenging cleanup work yet to be done at Hanford, it appears unlikely there would be meaningful insights and cleanup progress resulting from additional CRESP work. We do not see a value in spending the cleanup budget to complete this study. The Board strongly recommends that you not proceed with the remainder of this project and return its associated budget back to Hanford.

Sincerely,

Steve Hudson, Chair

Hanford Advisory Board

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Kevin Smith, Manager, U.S. Department of Energy, Office of River Protection cc: Stacy Charboneau, U.S. Department of Energy, Richland Operations Office Jon Peschong, Co-Deputy Designated Federal Official, U.S. Department of Energy Richland Operations Office

Joanne Grindstaff, Co-Deputy Designated Federal Official, U.S. Department of **Energy Office of River Protection** 

Dennis Faulk, U. S. Environmental Protection Agency Jane Hedges, Washington State Department of Ecology David Borak, U.S. Department of Energy, Headquarters

The Oregon and Washington Delegations